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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

CHRISTOPHER GARZA,

Plaintiff,

vs.

CITY OF SALEM, an Oregon municipal  
corporation; and OFFICER DAVID BAKER,  
an individual,

Defendants.

Case No. 3:22-cv-00721-HZ

PLAINTIFF'S PROPOSED VOIR DIRE  
QUESTIONS

**Plaintiff requests the following voir dire questions:**

**A. BACKGROUND—GENERAL**

- 1) Have you ever been a party to a civil or criminal case? If so, please explain.
- 2) Have you ever been involved with management or a manager at a public or private entity? If so, have you ever been involved in hiring or firing people? If so, please explain.

- 3) Have you ever worked for an insurance company or been involved in evaluating claims? If so, please explain.
- 4) Have you, any family members or close friends ever worked in a human resources department? If so, please explain.
- 5) Who knows you best in this world, and if they were asked, how would they describe you?

**B. BACKGROUND—RELATED TO ISSUES IN THIS CASE**

- 1) Have you, a family member or close friend ever believed that you were wrongfully pulled over or detained by a police officer? If so, please explain.
- 2) Have you ever had to report a car stolen? What were your experiences in dealing with the police in reporting a stolen car? If so, please explain.
- 3) Have you, any family members, or close friends ever had the experience that a police officer believed you had committed a crime but simply let you go without investigating or arresting you? If so, please explain.
- 4) Have you, any family members or close friends ever worked in law enforcement? If so, please explain.
- 5) Have you, any family members or close friends ever worked in health care? If so, please explain.
- 6) Have you, any family members or close friends ever worked for a government entity? If so, please explain.
- 7) Do you have any training, knowledge, or experience regarding procedures that law enforcement officers are supposed to follow? If so, please explain.
- 8) Have you ever been involved in evaluation of claims by anyone involving racial discrimination? If so, please explain.

**C. POTENTIAL BIAS**

- 1) Anyone have strong feelings about compensation for false arrest? If so, please explain.
- 2) Anyone have strong feelings about compensation for an individual subjected to racial discrimination? If so, please explain.

Dated this 9th day of October, 2023.

KAFOURY & MCDOUGAL

/s/ Jason Kafoury

Jason Kafoury, OSB #091200  
jkafoury@kafourymcdougal.com  
Of Attorneys for Plaintiff

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PROPOSED VOIR DIRE QUESTIONS** on the defendant(s) on the date indicated below by the following method:

- ☐ mailing with postage prepaid
- ☐ hand delivery
- ☐ facsimile transmission
- ☐ overnight delivery
- ☒ email

to said person(s) a true copy thereof, addressed to said persons at their last known address(es) and facsimile number(s) as follows:

Sebastian Tapia  
Salem City Attorney's Office  
555 Liberty St SE, Ste 225  
Salem OR 97301  
[stapia@cityofsalem.net](mailto:stapia@cityofsalem.net)  
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*Attorneys for Defendants*

Dated this 9th day of October, 2023.

KAFOURY & MCDOUGAL

/s/ Jason Kafoury

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Of Attorneys for Plaintiff